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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

25Aug11

GERALD E. VALEJOS,  
WJ/KBM  
Plaintiff,  
Vs.

Case No. 11-CV-00206

LOVLACE MEDICAL CENTER,  
CARMEN SMITH-SALAZAR, JOSEPHINE  
GOROSPE, SUZETTE HARIS, JENNIFER  
HOLLE, SARAH ATKINSON AND KEVIN  
SINCLAIR,

Defendants

Your honor, let me begin by saying thank you for allowing me 14 days to amend my complaint. However I had difficulty meeting the suspense date. I received the MEMORANDUM OPINION AND ORDER which was filed on 08/10/2011, on the following Friday, 12Aug11. There were other factors, please allow me to explain.

I do not have the resources, automobile, computer, or financial capability to have been able to complete all administrative requirements of this complaint/amended complaint. I have had to rely on the local Taylor Ranch library for computer use. The city of ABQ has a policy of 3 hours maximum for day for individual.

Not having an auto has meant reliance on the city bus transit system. My wife who has the only automobile cannot or will not loan it to me. And this has been probably the worst of my difficulties. My wife has a bi-polar condition known as manic-depressive. It has been a struggle contending with her irrational behavior on a daily basis, that I have almost given up on this case. She is under the care of a Dr. Kahn, psychiatrist, Presbyterian Hospital.

I am going to finish the amended complaint and bring it to the courthouse on Friday morning. Please allow me to continue, provided I met the requirements you set forth in your opinion. There were federal laws broken by Lovelace and its employees, I want to prove that. Another obstacle has been Lovelace Med Cen defense counsel. On 8Jul11, I Mailed to defense my "Plaintiffs request for documents" and "Plaintiffs first set of interrogatories to defense". As of this date defense has not cooperated. There is information that I could have used in the original complaint and amended complaint as factual evidence.

Respectfully yours,

  
GERALD E. VALLEJOS, Pro Se

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

15Aug11

Subject: Amended complaint. Case No 11-CV-00206 WJ/KBM

Plaintiff: Gerald E. Vallejos

Vs;

Defendant: Lovelace Medical Center, 601 Martin Luther King Av., NW. 87102  
505-727-8000 The employer.

Defendants: Employees who acted in their official capacity as agents of the employer.

- A. Kevin Sinclair, RN, Director Critical Care floor.
- B. Sarah Atkinson-Sinclair, RN, Nurse Manager, 8<sup>th</sup> floor sub-acute floor (Critical Care)
- C. Suzette Harris, RN, charge nurse or shift supervisor.
- D. Carmen Smith-Salazar, RN, charge nurse (night shift 1900-0700) or shift supervisor.
- E. Jennifer Holler, RN, charge nurse (day shift 0700-1900) or shift supervisor.
- F. Josephine Gorospe, charge nurse (day shift) or shift supervisor.

1. The adverse action of being terminated from employment I held for 19 years was in violation of Title VII, Civil Rights Act of 1964, Sec. 2000e-3 (section 704).
2. Violation of Federal laws enforced by the Equal Employment Opportunity Commission, established by Title VII, Civil Rights Act of 1964. The laws violated were sexual harassment; Work-place hostility, harassment, and retaliation for engaging in a lawful recognized protected activity, that of filing EEOC charges of sexual harassment, discrimination, and retaliation. EEOC charge no. 543-2009-00733, 19Mar09, and EEOC charge no. 543-2009-01162, 19Jun09.
3. Violation of employer's Code of Conduct every day, every decision" (not dated) EXHIBIT A.
4. The Vietnam Veterans Era Readjustment Act of 1974 was In effect when I was first hired by St Joseph Hospital in Dec89, I was kept on as an employee of Lovelace Medical Center on 18Jan06, EXHIBIT B. I believe the VVERA of 1974 would be applicable to me when I was retained by Lovelace Medical Center on 18Jan06 EXHIBIT B. The VVERA prohibited discrimination against Vietnam Veterans.

The employer, Lovelace Medical Center, was made aware of my complaints of being harassed, And treated with hostility of being slandered. I made formal complaints to the Nurse Manager, Sarah Atkinson-Sinclair on 17May09(exhibit C ) complaining about unfair, inequitable patient care assignments, that information on assignment sheets was deliberately misleading. To the compliance officer, Karen Bootzin, I think in Feb09, that I was denied the right to work by charge nurses Jennifer Holler and Carmen Smith-Salazar in their official capacity as charge nurse employees, I was scheduled to work on 3,13,17Nov08 but when I arrived at the hospital I was told that I was not scheduled. This was false. I visited with the employee relations manager, Jana Christopher Fed 09, the Human Resources director, Ed Gephart, date unk. I wrote letters to the upper levels of management at Lovelace Medical Center, the CEO, the President in 2008. I called the Ethics line (800) 633-2939, Nov08. No response received from Human Resources Director, no response from president, CEO; no response from ethics line people. There was no action taken by compliance officer, employee relations manager, nurse manager, or director critical care, to resolve my difficulties.

I was terminated from my employment by Kevin Sinclair, Director Critical Care floor, on 15Oct09, citing the reason as "not following instructions" this incident was treated as a violation of my probation (7 months) imposed in Jun 09 for allegedly "refusing a patient care assignment".

*al* co-defendants: Employees of Lovelace Medical Center, who in their official capacity acted as agents of Lovelace Medical Center.

1. Kevin Sinclair, RN, Director Critical Care floor. In the chain of command, supervisor of Nurse Manager, Sarah Atkinson-Sinclair, RN.
2. Sarah Atkinson-Sinclair, RN, Nurse Manager, 8<sup>th</sup> floor sub-acute unit, in the chain of command, supervisor of 8<sup>th</sup> floor sub-acute unit staff. Married to the Director.
3. Suzette Harris, RN, charge nurse on day shift. Considered the "senior" charge nurse. Prepares work schedules for nurses and other staff. Responsible for preparation of nurse assignment sheet for night shift personnel. Reports to Nurse Manager. Does not take patient care assignments.
4. Jennifer Holler, RN, charge nurse on days (formerly on night). Prepares nurse assignment sheet for night shift personnel. Shift supervisor.
5. Carmen Smith-Salazar, RN, charge nurse on nights, prepares nurse assignment sheet for Day shift personnel. Assisted with preparation of work (time) schedule, then took over sole responsibility for time schedule. Prior to being selected to be a charge nurse on nights on the step-down unit, Smith-Salazar only experience with the sub-acute floor at Lovelace was working via a supplemental nurse staffing agency. Smith-Salazar was the shift supervisor and reported directly to Sarah Atkinson-Sinclair, Nurse Manager.
6. Josephine Gorospe, RN, day charge nurse. Prepares nurse assignment sheet for night shift personnel. Shift supervisor.

None of the Registered Nurses required DIRECT supervision. No nurse in a critical care unit at any hospital would otherwise be disqualified to work in critical care if they (nurse) required DIRECT supervision.

*al* co-defendants met the definition of a clique. "An inclusive group of people who share common interests, views, purposes, patterns of behavior. Membership in a clique is typically exclusive, and qualifications for membership may be social or essential to the nature of the clique". From Wikipedia.

1. Kevin Sinclair, RN, Director Critical Care Unit (immediate supervisor of Sarah Atkinson-Sinclair). Mr. Sinclair was second Director of Critical Care floor, the previous one being Dayle Hoseck, RN. After Mr. Sinclair's assignment, he approached me and offered me \$3,500 retention bonus to stay in the 8<sup>th</sup> floor step-down unit, I accepted. Following my complaint to compliance officer, Feb 09 that I was being denied work after reporting for duty on 3,13,17 Nov08, I met with Mr. Sinclair, Sarah Atkinson, Jana Christopher, in Ms. Christopher's office Mar09. Mr. Sinclair said that how is it I can complain about not "getting enough hours" I replied that was not the nature of my

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complaint, it was that I was being turned away from the job after reporting for work with the explanation from charge nurses Carmen Smith-Salazar and Jennifer Holler that "I was not on the schedule". Smith-Salazar and Holler were acting in their official capacity as charge nurses when they deliberately, with pre-meditation and malice removed me from assigned work and replaced me with someone else. No further remarks were made by Atkinson, Sinclair, or Christopher, meeting terminated. Being denied the right to work was retaliation against me by Jennifer Holler, and her colleague Carmen Smith-Salazar for having complained about Jennifer Holler's sexual harassment of me Oct08, there was discrimination, I was not allowed to work, and someone else was chosen to take my place. No investigation was made of my complaint by either the Director, Nurse Manager, or employee relations manager. The employee relations manager, Jana Christopher, remarked to me at the meeting Mar09, that I "was fixated" with the schedule. No investigation conducted of incident 24May09, when I was accused of "refusing a patient care assignment" by either the Nurse Manager or the Director. Many witnesses present, only one was named, Suzette Harris, RN one of the defendants. Following my termination I applied for unemployment benefits, I was granted unemployment benefits following investigation by NM Dept of Workforce Solutions, EXHIBIT E. Note, a new patient was admitted to step-down unit following the patient I had allegedly refused. This new patient was assigned to me and I took care of this patient. If I was refusing patients that night, why did I not refuse this one as well?

17May09, this incident is discussed between myself (plaintiff) and Director Kevin Sinclair. It involves Carmen Smith-Salazar, in her official capacity as charge nurse prepares a nurse assignment sheet that assigns me four patients and Loyola Trujillo, RN, sometime alternate charge nurse with two patients. Assignment sheet is misleading because it also shows that Trujillo has three assigned rooms, room 7 is empty. It was a deliberate attempt to allow Trujillo to work a 12 hr shift with only two patients assigned. Mr. Sinclair's explanation was that Trujillo has discharged a patient at 2200 hrs on 17May09, from one of her assigned rooms. This was a lie. I requested documents from Defense to support my contention that Mr. Sinclair perjured himself, Defense has not complied with my "Requests for Documents, July09.

When Mr. Sinclair terminated me on or about 15Oct09 he said I did not follow instructions. He did not clarify his statement, he did not state what instructions. He went on to say I violated the NM Nurse Practice Act. I say this is false. I was never contacted by the NM Board of Nursing about any alleged misconduct. Exhibit \_\_\_\_\_.

- 2 Sarah Atkinson-Sinclair, RN, Nurse Manager, 8<sup>th</sup> floor Sub-Acute Unit, my (plaintiff) immediate supervisor. The fifth nurse manager to be assigned to step-down unit since I began in 2002. She arrived early or mid 2008. Nurse Manager selected all the female charge nurses, did not advertise, did not allow interested nurses from competing for charge nurse position. A fact, that after 6 months or more the nurse manager did not interview me or make any attempt to know me. It was only after I made a complaint against charge nurse Jennifer Holler that we first talked. Sarah Atkinson-Sinclair and The Director of Critical Care Kevin Sinclair involved romantically were married sometime in 2009. The hospital Code of Conduct, page 13, employment practices and workplace conduct prohibits conflict of interests EXHIBIT A. A conflict of interest will

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influence ones ability to make objective decisions while conducting business. The Nurse Manager and Director's responsibility was to supervise and manage the 8<sup>th</sup> floor SDU and Critical Care floor and treat all employees in an objective, fair and equal basis.

The nurse manager was engaged in other activities that gave the appearance of a conflict of interest when at official, mandatory staff meetings, she would baby-sit Carmen Smith-Salazar's new born for the entire meeting. I personally witnessed this conduct on at least three occasions, and the other staff attending can corroborate. Witnesses such as

Laquanda Stokes, RN, employee and Mark Staton, unit clerk, employee.

I requested of the Nurse Manager Sarah Atkinson-Sinclair on 24Dec08 and 12Jan09 for approval of my request for change of status from per diem to full-time. She ignored me. She did not reply to my phone requests or written requests for an answer to my applications. During this period there were new people hired to full-time positions in the step-down unit. Woody Creech, nurse recruiter can corroborate that I did indeed apply and that Sarah Atkinson-Sinclair was aware of my applications.

I received two evaluation ratings from Sarah Atkinson-Sinclair prior to my complaint against charge nurse Jennifer Holler. One with a 3.0 rating and the other 3.5. Both ratings said I met the requirements of the job. I inadvertently mailed my only copies to Defense Counsel. I sent defense counsel an e-mail requesting copies be send to me (exhibit\_F) no response from defense counsel.. My third rating was in Jun09, a zero rating. Given when I was placed on 7 months probation. I applied a minimum of two times for a full-time position, EXHIBITS G and H. The nurse manager never responded to me. I called her, left phone messages and written messages without a reply. Corroborating witness Woody Creech, Nurse Recruiter, Lovelace Med Cen.

Jun08, I fracture my right wrist, a splint was applied to my right arm (I'm right handed) I come to work, nothing is said to me by charge nurses or Nurse Manager about my injury. I am allowed to work! I did not request accommodation, nor was any offered. I was later placed in a firm cast from right elbow to hand. I continued working, without one word being said to me by either the manager or the charge nurses. There was no concern about patient safety or my ability to do the job .EXHIBIT I.

Kelly Bullard, RN, charge nurse, on nights, was suspended from work for 3-4 days for an incident that involved her and a black female nurse named Media Manpanduki. Ms. Bullard was allowed to return to work without any probation, and allowed to remain as a charge nurse or shift supervisor. Media Manpandki was terminated in 2009, following an medical error, no patient injury. Media was not suspended or placed on probation, she was immediately terminated.

Kelly Bullard as night charge nurse did not take patient care assignments. She had the time to. Ms. Bullard slept on the job, repeatedly. Corroborating witness, Laquanda Stokes.


Ms. Bullard's misconduct was not of concern to her. Just as fabricating the truth was not an issue for charge nurses Carmen Smith-Salazar, Jennifer Holler, and Josephine Gorospe. There is a certain phenomena that exists with people who are "in charge" They feel they can lie at will. That they will be believed.




2. Suzette Harris, RN, charge nurse on day shift, "shift supervisor", made patient care assignments to staff nurses, prepared or assisted in preparation of work schedule (time schedule) reported to Sarah Atkinson-Sinclair. Ms. Harris can be considered a co-worker of mine (the plaintiff). Ms. Harris is charged with defamation (slander) of plaintiff. Corroborating witness: Leelama Scaria, RN, alternate charge nurse.  
I asked to leave work early, 0500 hrs, the step-down unit was operating from 1800 to 0600 hrs. The date, not exact, but in Dec08, S. Harris, on duty as an employee and agent of the hospital. I told Ms. Harris that my wife requested me to leave early if I could, to see about our son, who was not answering her phone calls.  
I was permitted to leave. The next night at work, Leelama, approaches me and asks me if "my son is alright, I heard he tried to commit suicide" I gave her no reply, I was angry. A private, sensitive, conversation between myself and a charge nurse, Suzette Harris, is revealed to someone who has no right, no duty to know. I felt Suzette Harris was attempting to diminish me, degrade me to other staff. I view this as defamation. I did not tell Ms. Harris that my son was suicidal, she chose to embellish my remarks.
  
3. Jennifer Holler, RN, charge nurse on night, then changed to days. Made patient care assignments to staff nurses, by oral means, and by use of form called nurse assignment sheet. Considered a "shift supervisor" and a co-worker. Reported to Sarah Atkinson-Sinclair, Nurse Manager. Ms. Holler sexually harassed me. Complaint made to Sarah Atkinson, the Nurse Manager. Ms. Holler Considered a co-worker, EEOC charge 543-2009-00733, 19Mar09. Ms. Holler and Carmen Smith-Salazar, in their official capacity as employees and agents of the hospital, attempt to get me to come to work, I am not scheduled that night, but they insist that I am. I called the house supervisor (name unk) and asked her to look into this. *6Nov08*  
I received a phone call later from this house supervisor, and she told me, never mind, you do not have to come in, that the charge nurse is going to redo the assignments. This is not plausible. The nurses on duty would have caused an uproar, protesting the added workload at the start of the shift, the probability of admissions and/or transfers to the step-down unit is always high. I was not scheduled that night and the charge nurses lied to the house supervisor, who apparently was not a permanently assigned house supervisor. Work schedule for 6Nov08 requested from DEFENSE under "Plaintiffs request for documents" Defense has never complied.
  
4. Carmen Smith-Salazar, RN, charge nurse on nights. Responsible for making patient care assignments to nurses, assisted Suzette Harris with preparation of work schedule (time schedule) and later was solely responsible for the preparation of the work schedule. Considered as a "shift supervisor". Reported to Sarah Atkinson, Nurse Manager. Ms. Smith-Salazar harassed me (plaintiff) by denying me work on 3,13, and 17Nov08. By falsely accusing me of "refusing a patient care assignment" on 24May09. Following this accusation, a meeting was held between the Director, Nurse Manager, and employee relations manager and myself, about a week later, I denied the allegations, but I was not believed. I was placed on 7 months probation. I have never received any disciplinary action since Dec89 through Jun09. It wasn't until the arrival of Sarah Atkinson, and the group of charge nurses she appointed that my career began to suffer. Following my

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termination I applied for unemployment benefits and received them, following a Department of Workforce Solutions of NM investigation into alleged misconduct. Exhibit \_\_\_\_\_.

Carmen Smith-Salazar engaged in other harassing conduct towards me, acting as an employee and agent of the hospital, this charge nurse made patient care assignments to me that can be considered as potentially unsafe and dangerous to the patients. On 3-21-09, a patient admitted from the ER, named [REDACTED] was assigned to me. Mr. [REDACTED], I was told by the ER nurse about his many medical problems. He, Mr. [REDACTED], was also senile and had dementia. His wife asked for him to be located near the nurses station because of his "independence" I relayed this information to the charge nurse, Carmen Smith-Salazar, and acting in her official capacity as night charge nurse, she refused. I told her that room 25 is empty and is close to my other assigned rooms 25-28. She refused. She elected to place this 70+ years old patient with dementia, senility, weakness, into room 16. Room 16 is not visible from where I was sitting. I found Mr. [REDACTED] when checking on him, out of bed leaning against the wall and urinating on the floor, on the bed, and himself. All I could do was to set the bed alarm, to activate when he got out of bed. Remembering that room 16 is Out of my sight and the alarm would not necessarily be heard, since there is much work place noise pollution to consider. The next day, the day charge nurse moved Mr. [REDACTED] to a room closer to the nurses station. I was not on duty that day, finding out about this later. Mr. [REDACTED], transferred to step-down unit from the 4<sup>th</sup> floor because of an urgent medical need. Mr. [REDACTED] was combative, delirious, confused. A diabetic with a severely infected foot. The 4<sup>th</sup> floor nurse had just given him a strong sedative/tranquilizer called Ativan and I had doctors orders to continue using it. The problem here is that the charge nurse in her official capacity, transferred an otherwise stable, alert & oriented, ambulatory patient out of room 9 (at the far end of the hall) and placed Mr. [REDACTED] in room 9. Room 1 and 2 right next to the nurses station were empty. She chose to place the ambulatory, stable patient in the empty room next to the nurses station and place Mr. [REDACTED] at the far end of the hall. This was completely illogical, and showed no consideration for the patients safety. It was done as harassment of me. 

5. Josephine Gorospe, RN, charge nurse on days. Responsible for making patient care assignments to staff nurses. Ms. Gorospe is charged with defamation of character.

Exhibit D \_\_\_\_\_. The slander continued all the time she was assigned to the 8<sup>th</sup> floor SDU, Corroborating witness, Mark Staton, Unit Clerk. When J. Gorospe was assigned to work in the 8<sup>th</sup> floor step-down unit (date unk) she began to touch me in a way that I found offensive and unwanted. I knew she was married and I was married. I rejected her. The unwanted touching continued through early Nov 08, she now tells me that she is "throwing her husband out" I show no interest in her remarks and reject her. ~~6 Oct 08~~ 6 Oct 09, I report to work at 1900 hrs, taking over the patients that J. Gorospe had during the day shift. A patient in room 12, when I introduce myself to her, says that she had requested a female nurse" I apologized for the mistake, and would try to accommodate her. The charge nurse at this time, a Kelly Bullard, RN refused to attempt to accommodate the patient. I explained to the patient that nothing could be done at this hour, but that I would try to have a female attend to her as much as possible. She reluctantly agreed. This patient had no IV access, a violation of SDU policy, her potassium level was 2.6 a critical value. The previous nurse J. Gorospe had to have known this since she took the report from the emergency room. J. Gorospe passed on the responsibility and work of starting an IV for the patient and treating her critically low potassium level. I informed the Nurse Manager of this incident, there was no action that I know of taken against J. Gorospe. 

**Sexual harassment continued:**

A male nurse named Kurt Froelich, RN made offensive remarks to me while standing behind me waiting to use the PYXIS, the medication dispenser. While I would key in my code, he would suggest "why don't you put in gorgeous, or scrumptious" I first thought he was just immature and thought nothing of it. His conduct continued until I gave him a non-verbal message to stop. I truly believe that I was being characterized as homosexual by the staff.

Next, a male nurse called James Gonzales, RN from San Francisco, CA would touch me in a way that made me uncomfortable, patting my back, squeezing my arms. One night while passing each other in the hall, he came over to me and grabbed my hand, squeezed it, and gave me a wink.

These particular events happened between Nov08 and March09.

I complained to the Nurse Manager, Sarah Atkinson, about James Gonzales behavior. I did not Receive a response. April 09. I list Mark Staton, unit clerk, as a corroborating witness to Gonzales' actions.

Jun 11, I am approached at a local Wal-mart in NW ABQ by someone I worked with while in the 8<sup>th</sup> floor sub-acute unit. Her name Bobbi Schrader, RN.

Bobbi tells me that Carmen Smith-Salazar is no longer employed at Lovelace Medical Center. She (Ms. Schrader) also tells me that Kevin Sinclair, and his wife Sarah Atkinson-Sinclair have also stopped working at Lovelace Medical Center, and according to Bobbi, they left the state of NM. Bobbi Schrader is a current employee of the 8<sup>th</sup> floor step-down unit, Lovelace Medical Center. I believe the information she gave me is credible.

Bobbi Schrader, RN was also a target of Carmen Smith-Salazar. According to statements made by Laquanda Stokes, RN, staff nurse on nights. Carmen approached Laquanda and asked Laquanda to assist her (Carmen) in bringing adverse actions against Bobbi Schrader. Laquanda Refused. In my plan of discovery, Bobbi Schrader, Laquanda Stokes, were to be subpoenaed for Their testimony.



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7Oct09, I am being mocked by J. Gorospe, I request her to call me by my Hispanic name Geraldo, she laughs and slurs the name. I am irritated with her habitual conduct of mocking and taunting of me, I tell her that I am aware of what she told Vincent Beaulieu, RN when she was orienting him to the unit, slandering me, I saw J. Gorospe turn pale, and fearful, she hurried away from me. 8Oct09, I am told by the day charge nurse that the patient in room 12 has requested a different nurse. I'm surprised, but it happens often to all nurses. Later that week, I think the next day/night. The nurse manager and the director summon me. The director Kevin Sinclair says to me that an investigation will be conducted because of the patients request of wanting another nurse. That I will be suspended for 4 days pending the results of the investigation.


He added that I had violated the Nurse Practice Act. Following my termination I was never contacted by the NM board of nursing for misconduct, the Board of Nursing mandates that a nurses misconduct must be reported to the board for the boards action if necessary, EXHIBIT Mr. Sinclair did not do this, because I committed no misconduct. It happened that another male nurse Robert Farris, RN is told on ~~6 Oct 08~~ <sup>8 Oct 2009</sup> by Jamie Sandoval, RN, charge nurse, that a patient of his has requested a different nurse.

No action of any kind is taken against Robert Farris. I never learned of the results of any investigations related to my allegedly "refusing a patient care assignment", or my "not following instructions". I learned in the military that not following instructions is a cause for some type of remedial training, and giving an order is only 50% of a proper order, FOLLOW-UP is the other 50%.

I am not one to shy away from work. Exhibit J NM Spine, Dr. Richard Castillo, Grants me medium work, lifting 50 lbs max. 12-16-04 because of a newly diagnosed condition of Lumbar Stenosis with neuropathy. I never gave a copy of this work status form to my employer Lovelace Med Cen. I wanted to keep working as I always had, and continued to work without complaints or requests for accommodation.

After my termination, I applied for disability retirement and was granted disability insurance, Exhibit K

Respectfully yours,

  
GERALD E. VALLEJOS,  
Pro Se